

Issues Discussed

Great Plains Region Consolidated Planning Forum

Hosted by the St. Louis Office of Community Planning and Development
U. S. Department of Housing and Urban Development

Columbia, Missouri

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1. Strategic Plan, Annual Action, Plan and CAPER: Are they effective planning tools for program implementation?

- a. What are their strengths?
 - Did make them look at the objectives for their city and make them plan more.
- b. What are their weaknesses?
 - Often driven by the political process vs. high priority needs.
 - Was not possible to use as a tool from the State perspective.
 - Politicians' priorities take precedence over the Consolidated Plan's objectives.
 - In State's case, there are many participating jurisdictions. Incoming mayor wants to change City's priorities or projects set by outgoing mayor. Poorer cities may divide up funds evenly among wards. Also, City can integrate priorities of current mayor into plan. State cannot be that specific.
 - Priorities driven by 4-year term of governor, or length of term of mayor, aldermen, councilmen, or commissioners. These terms are not necessarily in synch with Consolidated Plan terms.
 - Only way to negate politics is to have a strong Citizen Participation Plan.
 - Some Citizen Participation Plans could be tightened up to deal with politics.
 - Not all cities have a Citizen Advisory Committee. In this case, staff generates proposals, and the City Council votes on them.
 - More flexibility is needed within the Consolidated Plan process.
 - Grantees felt like they had to "back into" the plans after dealing with the Annual Action Plan.
 - The Strategic Plan is too detailed.
 - The CAPER and Annual Action Plans are more beneficial than the three- to five- year Strategic Plan: 1) Grantees don't know what funding levels will be for subsequent years of Plan. (It was noted that there hasn't been much deviation in amounts recently.), 2) it's hard to budget five years out, and 3) it's easier to meet national objectives via the Annual Action Plan
 - The Strategic Plan doesn't mimic City Planning and Zoning plans/strategies, or Capital Improvement Plans.
 - The State can't isolate projects, but can isolate sectors (can recognize distressed areas and give priority points).

2. Streamlining the process

- a. Tables
 - In the Consolidated Plan, grantees didn't find the tables useful for anyone's planning purposes. They were considered meaningless, and not useful for projections.
 - Tables have no connection to the CAPER.
 - GPRs (the old way) were better. It's hard to compile data into IDIS.
 - Liked the tables in the CAPER.

c. Narratives

- Relative to more emphasis on outcomes: 1) Outcomes are viewed as a tool to gain re-election among elected officials, 2) other cities are not that political, and 3) others use the CAPER to show proposed vs. actual results, and attempt to do so in a tactful yet honest way when there has been non-performance.
- No one really reads or is concerned about the CAPER. City leaders only read the City budget and activities. Communication is limited to between HUD and the City's program manager for both the Consolidated Plan and the CAPER.
- No one really looks at whether grantee is getting anything out of the process.
- City can't get more funds until current funds are spent.
- It's not so much that funds aren't being spent, as it is that funds are spent on the "wrong" things (not high priority needs?). Strong Citizen Participation Plan could override aldermen.

3. ***Plan development: Coordination with other plans, consultation with other partners and citizens, and thoughts from those who help to write the plan, implement the plan, receive the funds, and evaluate the process.***

a. Plans

- HUD dollars and the Consolidated Plan are not in synch with other plans.
- Grantees already have numerous plans, and they don't need/want to do another.
- Neighborhood Plan and other plans should be used in conjunction with Consolidated Plan.
- Should use HUD planning funds to provide for planning that could be made part of the Comprehensive Land Use Plan, Capital Improvement Plan, or other plans.
- In the City's plan, can't always find eligible activities to match needs.
- Relative to the state's Consolidated Plan, small cities do not always have their own development plans. Planning is an eligible activity, however.
- Larger cities have neighborhood plans, which are given some consideration.

b. Partners (Public and private)

- The City offices had no interaction with the State.
- Some partnerships were more reactive than interactive.
- Process did make City pull in more people to participate in planning process, and to look closer at needs. Funds couldn't be spent if couldn't identify beneficiaries to receive them. Would like this woven into Annual Action Plan.
- Partners can be "Special Interests".

c. Interagency coordination

- City: Not enough communication between its Planning Department and Community Development Division (in some cases).
- State Consolidated Plan: Four to five agencies can be involved in implementation of plan.
- Consolidated Planning brings multiple agencies together that normally would not cross paths. State now has to use CDBG and HOME, etc. together to make projects work (one funding source is not enough).
- County contacts every department with a survey.
- City: Plan writers don't implement. Public works mostly involved in implementation and spending funds. Can be difficult to get them to coordinate on timing.

d. HUD competitive grant applicants

- Competitive grant recipients are receiving MHDC money, then wanting the City to sign-off on a plan.

- City: Competitive and formula grantees do not communicate (examples: HOPWA, Continuum of Care).
- State receives HOPWA for direct beneficiaries. Can't plan for increase in number of counties needing funds. State thinks HOPWA should not be covered via the Consolidated Plan process.
- e. PHAs
- Grantees want HUD to narrow down why a project was on the troubled list.
- f. Regionalism
- Offers economies of scale, such as when doing the Analysis of Impediments to Fair Housing
- Grantees approach transportation issues from regional perspective.
- g. Subrecipients
- Subrecipients participate in public hearings, some for funding only, others truly look at overall needs of community.
- Not always trying just to get money, but to really look at the overall picture of community needs.
- h. Elected officials
- New politicians are not aware of how the CDBG program works (what funds can be used for, how funds are distributed, etc.), which makes it difficult.

4. *Citizen participation (during plan development and draft review stages)*

- a. Public notices
- b. Publication of and access to draft and finished plans
- Public only wanted to view it if they felt their particular area wasn't receiving enough funding
- Participation when something goes wrong
- c. Public hearings
- Not attended well unless changes were proposed.
- d. Citizen comments
- Public comments taken via email or written letter.
- Public comment period too long for Consolidated Plan (should be changed from 30 to 15 days).
- Copy of Consolidated Plan put in local public library.
- About half of grantees in attendance stated that their Consolidated Plans are posted to their websites both during Plan development and after completion.
- e. Citizen complaints
- A common complaint was the question of why they didn't receive funding.
- f. Amendments (substantial or not?)
- Need flexibility; difficult to be specific about how projects fit.

5. *Access to data to be used in the plan.*

- Not finding unemployment data.
- Wanted to know when the new Census data would be distributed.
- Census data is not set up by neighborhoods.
- Important when setting up Neighborhood Revitalization Strategy.

6. *Housing and homeless needs analysis.*

- Thought information would be carried over from the Strategic Plan to the Annual Action Plan.

- Three to five years is too often when Census data is only available every ten years, unless survey data is available in the interim.

7. *Housing market analysis.*

- Thought every ten years was sufficient because it was based on Census data.
- Thought new data would be made available every five years.
- Suggested getting information from MHDC.
- Using Fair Housing data (limited from FH&EO), County Assessor data, and market analysis from Tax Credit applications.

8. *Community Development analysis.*

- Someone inside each City was putting together a report based on that City's need.
- State's Department of Natural Resources provides information on City's infrastructure needs (from reports submitted by City). EPA ultimately receives this data.
- Needs per Metro Sewer District vs. Alderman and CDBG can vary.

9. *Economic Development analysis*

- a. Anti-poverty strategy
- Housing usually more frequently addressed in Consolidated Plan than job creation or economic development.
- b. Relationship to EZ/EC initiative and its planning process
- Wanted to eliminate the state (not Federal) EZ/EC program because it was highly political.
- No coordination between the time they did the Consolidated Plan and the EZ/EC.
- Pockets of poverty exist that go unaddressed.
- c. Welfare-to-Work
- Some grantees used the Consolidated Plan as a tool for economic development.

10. *Section 3.*

- Exercise in compliance for the State, applying urban goals to rural areas.
- Difficult to get good numbers on Section 3.
- Received complaints from individuals and businesses.
- Thought the forms could be simplified.
- Training was helpful, but it was still difficult to get good results.
- Urban in concept, hard to overlay on rural areas. Crews are usually brought into rural areas from elsewhere.
- Would be easier if questions were asked at bid time, rather than at job completion. Contractors could be Section 3 and not even know it.
- PHA wants their residents placed first.

11. *The relationship to the Public Housing Authority and the issue of "troubled" PHAs.*

- Sometimes unclear why PHA is considered troubled. State has difficulty in assessing how to help because of this confusion.

12. *The relationship of the Consolidated Plan to the Continuum of Care initiative.*

13. *Does the current process allow for:*

- a. Linkages from needs to objectives to actions?
- The process and C2020 force them to show the linkages.

- Liked the fact that it kept them from making errors.
- b. Illustrating why a particular strategy is being pursued?

14. *How can the process result in measurable results during the action phase?*

- a. Measurable goals/objectives
- No control over who applied.
- Lead-based paint issues can affect how many housing units are actually rehabbed.
- Difficult to predict over a five year period how many units would be done, not just in housing, but in other project areas.
- Need a way to establish flexibility in the Annual Action Plan.
- When measuring the results in IDIS, how would you measure something like park improvements?
- There appear to be different instructions for HOME and CDBG (projects and activities). This could be causing a data cleanup problem.
- Person responsible for program implementation is not always same person that wrote the Consolidated Plan (difficult to understand/interpret intended outcomes).
- Outputs vs. outcomes: could measure by benchmarks and indicators.
 - a. Benchmarking
 - b. Tracking
- For the State, it's hard to see outcomes directly attributable to small the amount of CDBG that accompanies other funds
 - c. Reporting
 - d. Revisions when come up short

15. *How useful has Community 2020 been as an analytical tool for preparing the Consolidated Plan*

- a. Mapping
- Mapping didn't work well, but everything else worked fine. Most grantees have better local systems than C2020.
- Has to be used often in order to remember how it works.
- b. Plan submission
- The forms to submit the Plans were helpful.
- Can plot targeted areas for projects, and where actual activities were done.

16. *The relationship of C2020 and IDIS.*

- IDIS doesn't allow for setting up beneficiaries for a city park.
- Input not uniform from one grantee to another.
- Need definitions of project vs. activity.
- Order that projects are entered in C2020 is not the same order given to them by IDIS

17. *IDIS.*

- Is the information from IDIS beneficial in the long run?
- Would it be useful if each community listed the information differently?
- Inconsistency may be the problem with IDIS cleanup.
- On the accomplishment screen, making the choices fit the activities is a challenge (a unit cannot be distinguished as demolished, rehabbed, or constructed).
- Thought it would be helpful to expand the list of choices.
- What was being measured (households, families, etc.) was a question.

- Want a system that would capture information as grantees move through program implementation during entire year.
- Can't be creative with the CDBG funds, and then fit it into a category in IDIS.
- State used IDIS as a draw down feature.
- What is measured should be consistent.
- System does not distinguish between large vs. small families.
- Have to recreate and ask question at time of activity. Need a way to capture and report all things that HUD wants to know.
- Inputting done by many staff members.

18. *Certifications.*

- Is there an overriding version of the ESG certification? State has two versions, which is right one?

19. *The Analysis of Impediments to Fair Housing (AI).*

- Grantees want better information on what cases were filed in their City.
- Want better criteria for identifying fair housing impediments from HUD.
- Want to know the major impediments.
- Want data sources.
- Difficult to get data if City doesn't have an agency that is substantially equivalent.
- Data can be obtained from Human Rights Commissions.
- HUD could improve process by defining "impediments." Appears to be inconsistencies among HUD offices.
- Regulations are hard to use for AI.

20. *CAPER*

- a. IDIS reports
- b. 90-day deadline for submission
- Cities/County felt it was easier to accomplish in IDIS, State did not (hard for State to do manually).
- Hard to get data out of IDIS for CAPER.
- c. Grantee accountability (proposed vs. actual results)